

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
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This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,  
04-cv-1076 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD  
ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"); Plaintiffs added as parties pursuant to the Court's May 4, 2022, June 15, 2022, and June 28, 2022 Orders (ECF Nos. 7949, 8111, and 8150); and, the fourteen (14) proposed Additional Plaintiffs listed in Appendix 1 to Exhibit A, beginning at number 3,117 (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a true and correct copy of the Proposed Fifth Amended First Consolidated Complaint. Appendix 1 to Exhibit A, starting at number 3,117 lists the fourteen (14) proposed Additional Plaintiffs ("Additional Plaintiffs"). Presently pending is an additional Motion to Add Parties, dated August 1, 2022, ECF No. 8301. All other Plaintiffs listed on Appendix 1 were already added to the case pursuant to the Court's May 4, 2022, June 15, 2022, and June 28, 2022 Orders (ECF Nos. 7949, 8111, and 8150).

3. While Anderson Kill P.C. intended to cease accepting new clients against the Taliban at the end of the spring, several individuals subsequently contacted undersigned counsel and requested to join the litigation.

4. After consulting with co-counsel, including all member firms of the Framework Agreement previously disclosed to the Court, *see* ECF No. 7790, undersigned counsel confirmed that these individuals would be permitted to participate in the Framework Agreement, and so undersigned counsel agreed to accept their engagement.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Additional Plaintiffs Against the Taliban.

Dated: August 25, 2022  
Reno, Nevada

/s/ Jerry S. Goldman

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